

May 24, 1991

Reference No. 1916

Mr. Bill Simes  
United States Environmental Protection Agency  
Region V (5HE)  
230 South Dearborn Street  
Chicago, Illinois  
U.S.A. 60604

Mr. Rod B. Thompson, Section Chief  
Department of Environmental Management  
State of Indiana  
5500 West Bradbury Avenue  
Indianapolis, Indiana  
U.S.A. 46241

Gentlemen:

Re: Schedule of Sampling Activities  
Former P.R. Mallory Plant Site  
Crawfordsville, Indiana

Further to our letter dated April 24, 1991 we are writing to provide details pertaining to the proposed groundwater and sediment sampling at the above noted Site. We plan to commence sampling activities on Monday, June 24, 1991, unless excessive rainfall prior to this date necessitates postponement.

As noted in our April 24, 1991 letter, groundwater sampling will include the collection of groundwater samples for PCB analyses, from all existing on-Site monitoring wells, the abandoned on-Site production well, Terra Products domestic and industrial wells, and Superior Moving's well.

The Little Sugar Creek sediment sampling will include the collection of approximately 10 to 12 sediment samples in the region from the outlet of the creek which traverses the Site, extending approximately 2,000 feet downstream. In addition, one "background" sediment sample will be collected upstream of the creek outlet. As proposed in Attachment A of our letter to IDEM dated January 17, 1990 (approved in principal by IDEM by letter dated February 5, 1990), sediment samples will be collected in accordance with the following procedures.

- Agency (IDEM and/or USEPA) and CRA representatives will conduct a "walk-through" along the south bank of Little Sugar Creek immediately prior to sediment sample collection to tentatively identify deposition areas and delineate the upstream and downstream limits of sampling; personnel will not enter the creek channel, to avoid excessive disturbances of the bottom sediments. Areas will be marked by use of flagging on bankside stakes or vegetation. Suspected areas of deposition will be defined by stream channel geomorphology, stream flow regime, presence/absence of submergence/emergent vegetation, etc.
- Movement of sampling personnel will be against the current flow, (eg. downstream to upstream) to avoid cross-contaminating sampling locations.
- Sampling tools will consist of pre-cleaned sections of 1/2" - 1" diameter stainless steel tubing. The cleaning protocols will be consistent with those used for other soil samples at the Site or as mutually agreed upon by CRA/Agency representatives. It is anticipated that dedicated tools will be used at each sample location. However, field (rinse) blanks may be collected to demonstrate that tools are free of residual PCB contamination. Tools used for splitting, duplicating or other types of sample handling will be pre-cleaned and dedicated to each unique sampling station.
- The stainless steel tubing will be used in a manner consistent with a core sampler. This method minimizes cross-contamination of sample material, allows for reasonable penetration of stream bed substrate, and minimizes sampling personnel contact with the sample material. The tubing will be advanced into the substrate to a depth of approximately 12 inches, to obtain the sample material.
- Each identified area will be "probed" to assess the type of material found in the deposition area. Ideally, fine-grained sediments or entrapped decayed vegetative matter will be found. CRA, in consultation with the on-Site Agency representative, will determine whether the sample will be submitted for analyses.
- Sample material will be split at the request of the Agencies. Materials will either be placed directly into jars, or homogenized and split using dedicated, pre-cleaned sampling tools (i.e. stainless steel bowls and spoons).
- After the sample is obtained, the sample location will be marked for future reference, by setting stakes on the south bank of the stream.

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- Samples will be shipped to Wadsworth/Alert Laboratories located in North Canton, Ohio, under approved Chain of Custody protocols for PCB analyses. Analytical protocols will be consistent with those approved for the Phase III Removal Action performed at the Site.

Alternatively, if convenient, sediment samples will be collected either by hand coring using pre-cleaned stainless steel sampling utensils, or using pre-cleaned split-spoon samplers, as appropriate.

We will contact both USEPA and IDEM during the week of June 17, 1991 to confirm arrangements. If you have any questions in this regard, please contact Bob Pyle at (716) 283-6720 or me at my new telephone number, (519) 725-3313.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES



Jay Churchill, P. Eng.

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c.c. Romer Wilsek  
Bob Pyle